Roy F. Weston, Inc.
11840-D Kempersprings Drive
Cincinnati, Ohio 45240-1640
513-825-3440 • Fax 513-825-3336

7 July 1997

Mr. Paul Steadman, M.P.H.
U.S. EPA Region 5
77 West Jackson Boulevard
SE-5J
Chicago, IL 60604

RE: Administrative Order of Consent: GHR Foundry: Dayton, Ohio
Monthly Progress Report
Report #2

Dear Mr. Steadman:

On behalf of our client, Mr. Raymond Carcione, President, Foundry Sales & Supply, Inc., and in accordance with the requirements of the Administrative Order of Consent for the GH&R Foundry Site, Roy F. Weston, Inc. (WESTON®) is submitting this monthly progress report describing field activity at the GHR Foundry Site, 400 Detrick Street, Dayton, Ohio. This report covers the month of June 1997.

Sampling and removal activities as described in the approved Revised Work Plan continued at the site throughout the month of June 1997. Activities were conducted per the approved revised schedule, followed the requirements of the site Sampling and Analysis Plan and Health and Safety Plan, and are described herein.

WESTON subcontractors participating in the removal activities this month include the following firms:

Laboratory Analyses - Waste Characterization	Intertek Testing Services, Inc. of Colchester, Vermont
Laboratory Analyses - PCB Analysis	National Environmental Testing, Inc. of Dayton, Ohio
Asbestos Containing Materials Removal Oversight	Helix Environmental, Inc. of Dayton, Ohio
Asbestos Containing Materials Removal	American Environmental, Inc. of Cincinnati, Ohio
Transformer Staging	The Staver Group, Inc. of Franklin, Ohio
PCB Items Removal	Laidlaw Environmental Services, Inc. of Twinsburg, Ohio
Site Security	Merchant Security Service, Inc. of Dayton, Ohio

Work Performed in June 1997

Site Security

Periodic site inspections continue to be performed by Merchant Security Services, Inc.

ACM Removal

Friable ACM was removed from the office building, and was loaded into lined roll-off boxes, each with a capacity of 40 cubic yards. The material was shipped as ACM waste to the Rumpke landfill located in Cincinnati, Ohio. Copies of the manifests will be provided to EPA in the final site report. Negative air machines coupled with full containment were used to prevent the escape of asbestos particles during the removal activities. Area sampling was performed during the removal activities to document upwind and downwind particle counts. Aggressive clearance sampling was conducted by the oversight contractor 11 June 1997. This process involves use of compressed air to attempt to dislodge any free particles that are adhering to the interior structures. The dislodged particles are then captured on a filter using a vacuum pump, and analyzed for total airborne particle concentration. Results confirm that the building is free of loose ACM.

Friable ACM, which had been bagged and stored in Room G, was loaded into lined roll-off boxes for disposal. The material was shipped as ACM waste to the Rumpke landfill located in Cincinnati, Ohio. Abatement activities were temporarily suspended when oil was observed on the floor, which was in contact with the bags. A sample of the oily material was collected and analyzed for PCBs. Results of testing performed by NET laboratories indicated that PCB content was less than 50 milligrams per kilogram (mg/kg). Abatement activities then resumed, and all remaining ACM was removed 21 June 1997. ACM from both the office and room G filled three 40-yard roll-off boxes.

Several panels of transite were removed from the roof of Plant G.

TSCA Waste Removal

Five transformers were removed from the second floor of Plant G on 11 June 1997. All five were found to be empty.

Transformers from the first and second floors of Plant G were placed in a staging area within the fenced area surrounding Plant G. The staging are was constructed of two layers of 6 mil (6 thousandths of an inch thick) plastic, which was spread over a concrete pad, and over a straw bale berm. A broken valve on the bottom of one transformer (SR# YBR91832) resulted in a leak

of less than 1 quart of oil to sorbant pads, placed under the valve. The sorbant was containerized for disposal as PCB waste.

Laidlaw, Inc. performed RCRA/TSCA/Non-hazardous waste removal activities at the site during the last week of June. Approximately 2,500 gallons of drummed PCB liquids were pumped from the drums of Room G into a vacuum truck on 23 June 1997 and were transported to Laidlaw's Twinsburg, Ohio facility. Coolant from the transformer next to the office, known to contain PCBs at a concentration of 43 parts per million (ppm) was included in the shipment.

On 24 June 1997, 15 transformers, 52 capacitors, 3 oil-filled switches, 49 drums that had been emptied of PCB oils the previous day, and miscellaneous debris , such as light ballasts, PPE and sorbant, associated with the PCB removal activities were transported to Laidlaw's Twinsburg, Ohio facility.

Drum/UST Contents Analyses

Analytical results from the Drum/UST sampling event were received 20 June 1997. Maximum PCB concentration detected in samples taken from drums/USTs that were not in Room G was 0.006 ppm which is far below the TSCA regulatory limit of 50 ppm. Characterization of the following two waste streams resulted from this analysis:

1. RCRA ignitable liquids
2. Non-regulated oils

Copies of the data will be provided to EPA in the final site report.

Gas Cylinders

Arrangements were made with the original suppliers to remove a total of 16 gas cylinders from the site during the first week of June. Cylinders will be cleaned, tested and reused by the suppliers.

Planned Activities

RCRA/TSCA/Non-hazardous Waste Removal

Oily dirt and solids covering the floor of Room G are expected to be containerized the first week of July. Based on results of a sample of material analyzed by NET laboratories, the material will not be considered a TSCA waste. These solids, PPE and pallets upon which the drums of PCB oils were placed are expected to be disposed of during the next waste pickup by Laidlaw.

Analytical results of wastes shipped to Laidlaw's Twinsburg, Ohio facility are expected in mid July. These results will be used to determine the ultimate method for disposing of the wastes.

Gas Cylinders/Batteries

Lead/acid batteries are expected to be removed from the site in early July.

Debris Removal

The debris removal action, awarded to Steve R. Rauch, Inc., was delayed while details were approved regarding prevention of the migration of materials from the site. The resolution of these details is described in WESTON's Letter to U.S. EPA dated 6 June 1997. Debris removal activities are expected to commence 7 July 1997.

Schedule

The removal action schedule, which reflects the latest information and projected events, is attached.

If you have any questions regarding this notification, please contact me or Michael May at (513) 825-3440.

Very truly yours,

ROY F. WESTON, INC.

Bradford S. White, Ph.D.
Senior Project Manager

BSW/mpm

Attachment

cc: Mr. Tom Buchan / OEPA
Mr. Jeffrey Cahn / U.S.EPA Region 5
Mr. Raymond Carcione / Foundry Sales & Supply, Inc.
Mr. Aaron Bulloff, Esq. / Kadish, Hinkel & Weibel
Mr. Dusty Hall / City of Dayton

Proposed Schedule for
On-Site Sampling and Removal Actions
Former GH&R Foundry

			5/19-5/23	5/26-5/30	6/2-6/6	6/9-6/13	6/16-6/20	6/23-6/27	6/30-7/4	7/7-7/11	7/14-7/18	7/21-7/25	7/28-8/1	8/4-8/8	8/11-8/15
ACCESS CONTROL															
	Fence Installation/Signs	*Completed 3/14/97*													
	Move Debris from Fence Location	*Completed 2/28/97*													
	Building Lockdown	*Completed 2/28/97*													
	Site Security/Surveillance	*Ongoing Since 2/24/97*													
WORK PLAN PREPARATION															
	Work Plan	*Completed 4/22/97*													
	Sampling & Analysis Plan	*Completed 4/22/97*													
	Health & Safety Plan	*Completed 4/22/97*													
	EPA Approval	*Completed 4/29/97*													
REMOVAL ACTIONS															
	Site Inventory	*Completed 3/20/97*													
	Contractor Selection														
	RCRA/TSCA Liquids	*Completed 6/12/97*													
	ACM Abatement & Oversight	*Completed 5/13/97*													
	Debris Removal	*Completed 5/12/97*													
	Laboratory	*Completed 6/20/97*													
	Implementation of Sampling Program														
	Asbestos Survey & Sampling	*Completed 3/17/97*													
	USTs Location & Sampling	*Completed 5/30/97*													
	Transformer/Capacitor Sampling	*Completed 6/24/97*													
	Drum Sampling	*Completed 5/30/97*													
	Removal and Disposal														
	Asbestos Abatement	*Completed 6/21/97*													
	RCRA/TSCA Liquids														
	UST Liquids	*NA*													
	Debris														
	Drum, Battery, Cylinder														
REPORTS AND NOTIFICATIONS															
	EPA OSC Notification of Activity	*Ongoing*													
	Asbestos Abatement Notification	*Completed 5/14/97*													
	Monthly OSC Reports														
FINAL REPORT PREPARATION															

Roy F. Weston, Inc.
11840-D Kempersprings Drive
Cincinnati, Ohio 45240-1640
513-825-3440 • Fax 513-825-3336

30 July 1997

Mr. Paul Steadman, M.P.H.
U.S. EPA Region 5
77 West Jackson Boulevard
SE-5J
Chicago, IL 60604

RE: Administrative Order of Consent: GHR Foundry: Dayton, Ohio
Monthly Progress Report
Copy of Report #2

Dear Mr. Steadman:

Per our conversation at the site, enclosed is a duplicate original of the monthly progress report #2, dated 7 July 1997.

If we can be of any further assistance, please contact Michael May or me at (513) 825-3440.

Very truly yours,

ROY F. WESTON, INC.

Bradford S. White, Ph.D.
Senior Project Manager